

**ORIGINAL**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Wireless Fixed Access )  
Local Loop Services )  
 )  
Petition for Allocation of )  
Radio Spectrum in the 2 GHz )  
Band for the Provision of )  
Wireless Fixed Access Local )  
Loop Services )

RM No. 8837

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**REPLY OF CYLINK CORPORATION**

Cylink Corporation ("Cylink"), by its attorneys, hereby submits this reply to the comments addressing the Petition for Rulemaking filed June 10, 1996, by DSC Communications Corporation ("DSC").<sup>1</sup> In its petition, DSC asks the Commission to allocate spectrum between 1.3 and 2.7 GHz for wireless fixed access-local loop service, and it suggests a number of alternative allocations within this range.

The record reflects strong opposition to the allocation of any portion of the 2400-2483.5 MHz band for wireless fixed access-local loop operations, verifying Cylink's position that an allocation including any portion of this band would be wholly inappropriate. In addition, the record indicates that the Commission should exercise caution in evaluating each of the band plans proposed by DSC and supports consideration of other spectrum options.

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<sup>1</sup> DSC Communications Corporation, Petition For Rulemaking (filed June 10, 1996).

Noted for file  
L. J. B. 10/1/96

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In general, the commenters responding to DSC's petition agree that several of the allocations suggested by DSC are inappropriate candidates for wireless fixed access-local loop operations because the spectrum in question is already allocated for other purposes. For example, a number of commenters echo Cylink's opposition to the allocation of any portion of the 2400-2483.5 MHz band for wireless fixed access-local loop service because of the extensive use of the 2400-2483.5 MHz band by industrial, scientific, and medical ("ISM") applications and unlicensed Part 15 devices.<sup>2</sup> These commenters generally agree that the allocation of any portion of the 2400-2483.5 MHz band for licensed services, such as wireless local loop, would be inconsistent with prior Commission policies and decisions, and would injure the public interest by jeopardizing Part 15 development and operations.<sup>3</sup>

Other commenters have identified similar problems with additional bands proposed by DSC. For example, several commenters oppose inclusion of the 2310-2360 MHz band as a possible allocation for wireless fixed

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<sup>2</sup> See *generally* Partial Opposition of Cylink Corporation, RM No. 8837 (filed Aug. 12, 1996); Partial Opposition of Metricom, Inc., RM No. 8837 (filed Aug. 12, 1996); Opposition of the Part 15 Coalition, RM No. 8837 (filed Aug. 12, 1996); Comments of Lucent Technologies Inc., RM No. 8837 (filed Aug. 12, 1996). See *also* Comments of 3Com Corporation, RM No. 8837 (filed Aug. 12, 1996) (opposing allocation of the 2400-2483.5 MHz band because of the disruption to wireless local area networks); Comments of Northern Telecom Inc., RM No. 8837, at 30 (filed Aug. 12, 1996) (noting that the 2 GHz band has been identified for multiple other applications and should be avoided as a potential home for wireless fixed access-local loop services).

<sup>3</sup> See Comments of Lucent Technologies Inc. at 1-3; Opposition of the Part 15 Coalition at 2-4; Partial Opposition of Metricom, Inc., at 3-6; Partial Opposition of Cylink Corporation at 1-4.

access-local loop operations because that band was recently allocated for satellite DARS.<sup>4</sup> Similarly, ITS Corporation and the Wireless Cable Association International, Inc., oppose the allocation of spectrum used by or adjacent to frequencies used by the wireless cable industry.<sup>5</sup> Likewise, Ericsson Inc., generally opposes use of the 2 GHz band for wireless local loop operations, noting that the band is particularly well-suited for the provision of mobile services.<sup>6</sup> Finally, George W. Hopkins, an Amateur Satellite Service operator, opposes any allocation of the 2400-2438.5 MHz and 2401-2439.5 MHz bands as incompatible with Amateur Satellite Services operations in those bands,<sup>7</sup> and the MSS Coalition opposes allocation of 2160-2200 MHz, underscoring international and domestic allocation initiatives to facilitate the deployment of mobile satellite services in that band.<sup>8</sup>

Cylink submits that the comments responding to DSC's petition for rulemaking highlight the need for the Commission to evaluate carefully each of the spectrum band plans proposed by DSC. A number of DSC's suggested

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<sup>4</sup> See, e.g., Partial Opposition of CD Radio Inc., RM No. 8837 (filed Aug. 12, 1996); Comments of Primosphere Limited Partnership, RM No. 8837 (filed Aug. 12, 1996).

<sup>5</sup> See Partial Opposition of ITS Corporation, RM No. 8837, at 3-6 (filed Aug. 12, 1996); Partial Opposition of the Wireless Cable Association International, Inc., at 1-5 (filed Aug. 12, 1996).

<sup>6</sup> See Comments of Ericsson Inc., RM No. 8837, at 1-3 (filed Aug. 12, 1996).

<sup>7</sup> See Letter from George W. Hopkins to the Federal Communications Commission (Aug. 5, 1996).

<sup>8</sup> See Opposition of the MSS Coalition, RM 8837, at 3-7 (filed Aug. 12, 1996).

band plans include spectrum that is allocated to -- and in a number of cases, heavily occupied by -- other services. DSC has not shown that wireless fixed access-local loop operations would be consistent with other uses and in most cases, the commenters suspect that existing operations and wireless fixed access-local loop service would be incompatible.<sup>9</sup> Moreover, several commenters agree with Cylink's suggestion that other more suitable allocations are available for the operations proposed by DSC.<sup>10</sup>

Of particular importance to Cylink, the record reflects strong opposition to the allocation of any portion of the 2400-2483.5 MHz band for wireless fixed access-local loop operations. The commenters addressing the issue agree that the 2400-2483.5 MHz band is so heavily occupied by ISM and Part 15 operations that an allocation of any portion of this spectrum for an additional licensed service would not be workable. Moreover, as noted in Cylink's comments as well as those of other parties, the Commission recently reaffirmed the importance of Part 15 operations in the 2400 MHz band and declined to allocate a segment of the band for other services because of the

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<sup>9</sup> See, e.g., Comments of Lucent Technologies Inc., at 3; Opposition of the Part 15 Coalition at 3; Partial Opposition of Metricom, Inc., at 4-6; Comments of 3Com Corporation at 2-3; Partial Opposition of Satellite CD Radio Inc., at 5; Partial Opposition of the Wireless Cable Association International, Inc., at 6-8; Partial Opposition of Cylink Corporation at 1-3.

<sup>10</sup> See, e.g., Comments of Northern Telecom Inc., at 30 (suggesting that 3.4-3.7 GHz would provide sufficient bandwidth and adequate propagation characteristics for the service suggested by DSC); Comments of Ericsson Inc., at 2 (suggesting an allocation above 3 GHz); Partial Opposition of Cylink Corporation at 5-6 (noting other alternative allocations available for the service proposed by DSC).

potential interruption to Part 15 devices. As such, an allocation of any part of this spectrum for the types of operations proposed by DSC would be contrary to prior Commission policies and would not serve the public interest.

Respectfully submitted,

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Dated: August 27, 1996

CERTIFICATE OF SERVICE

I, Kim R. Riddick, hereby certify that on this 27th day of August, 1996,  
I caused copies of the foregoing "Reply of Cylink Corporation," to be service  
via first-class postage prepaid mail to the following:

Mr. James L. Donald  
Chairman and Chief Executive Officer  
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